

EXHIBIT J

DECLARATION OF BENJAMIN DAVID

I, Benjamin David, have personal knowledge of the facts set forth below and if called to testify about them, I would do so competently.

1. Exhibits 1 and 2 to the Amended Arbitration Demand are true and correct copies of the contracts I executed.
2. Exhibit 1 to this Declaration is a true and correct copy of an email I received from a Wealth Assistants employee named Nate Fancher. The email states that if Wealth Assistants sets up a store for me, after a year of that store's operations "we'll be seeing a net profit each month of an average of \$10k—per month—and continuing to scale up from there. If not, we will buy back the store from you."
3. Exhibit 2 to this Declaration is a true and correct copy of an email thread containing emails between myself and individuals who appear to be employees of Wealth Assistants. The thread contains an email sent by Matthew Crouch on October 19, 2022, where Matthew Crouch states, in part, "Regarding our conversations over the past week, if your store is not producing sales and making you income by 12/31/22, we will refund your investment to wealth assistants."
4. I received a total of \$4,641.22 of revenue in connection with the online stores I purchased from Wealth Assistants. I received all of that revenue before September 17, 2022. I never received any revenue in connection with the online stores I purchased from Wealth Assistants on or after September 17, 2022.
5. In early October of 2022, Wealth Assistants gave me an additional Amazon store called Besos LLC. By this time, my first store had been shut down by Amazon.

6. On December 19, 2022, I had a call with Wealth Assistants' employee Noah Wickam. He said Wealth Assistants was buying the products for my store, and after it had purchased those products and shipped them to Amazon for sale, Wealth Assistants would invoice me.
7. On January 14, 2023, a Wealth Assistants employee named Brandon Andrews sent me an email with an invoice for inventory for my store, which requested that I pay \$10,263.23. I responded to Andrews, via email, requesting that he provide proof that Wealth Assistants had purchased \$10,263.23 worth of inventory for my store. Andrews did not respond.
8. On January 23, 2023, a Wealth Assistants employee named Carlos Medina sent me an email with another invoice for inventory for my store, which requested that I pay \$10,101.03. He did not reference the previous invoice that I had received from Brandon Andrews.
9. No inventory was ever uploaded into Besos LLC, so the store never generated any sales.

I declare under the penalty of perjury under the laws of the State of California, and under the penalty of all perjury laws of all other states in the United States, that the foregoing is true and correct.

Signature: *Benjamin M. David*

Date: 03/04/2024

EXHIBIT 1

totalhealthnm@gmail.com

From: Nate Fancher <nate@wealthassistants.com>
Sent: Thursday, May 26, 2022 1:53 PM
To: totalhealthnm@gmail.com
Subject: Meeting Recap

Ben,

Great meeting with you!

Wealth Assistants is committed to building and operating a successful Amazon store 95% done for you.

Our target is for you to at least break even on your initial setup fee by month 12. At that point we'll be seeing a net profit each month of an average of \$10k—per month—and continuing to scale up from there. If not, we will buy back the store from you.

Here are some important links for you to review:

Our Service:

- [Our Service Slide Deck](#)
- [Our website](#)

Earnest Deposit:

We can secure your spot while you explore this with us. To do so please place a fully refundable \$1,000 deposit here: [Deposit link](#)

This protects our calendar, and holds your spot, as we have limited capacity for follow up calls and onboarding potential clients. We'll also send over our service agreement for you to review during this exploratory phase.

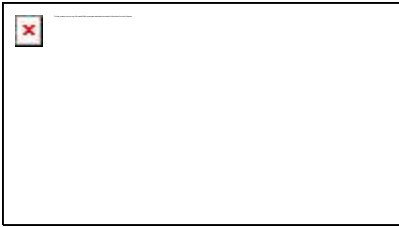
Meet Our Director Of Operations:

This video between Ryan and Noah gives you a picture of the backend operations and how the business model works.

<https://vimeo.com/707141200/80e50bb294>

Best Regards,

Nate Fancher
Business Portfolio Manager
E: nate@wealthassistants.com
P: +1 949-998-4410
W: wealthassistants.com



Assisting People Build Modern Day Wealth

EXHIBIT 2

benlajefa@gmail.com

From: benlajefa@gmail.com
Sent: Wednesday, January 11, 2023 2:59 PM
To: 'Matt Crouch'
Cc: noah@wealthassistants.com; carlos@wealthassistants.com; nate@wealthassistants.com; 'Brandon Andrews'; 'Max Day'
Subject: RE: Your Amazon seller account has been deactivated

Good afternoon,
12/31/22 has passed. Please honor your commitment below to fully refund my \$35,000 investment I paid to Wealth Assistants. It is now time to part ways.
Please confirm
Ben David

From: Matt Crouch <matt@wealthassistants.com>
Sent: Wednesday, October 19, 2022 11:08 AM
To: benlajefa@gmail.com
Cc: noah@wealthassistants.com; carlos@wealthassistants.com; nate@wealthassistants.com; Brandon Andrews <brandon@wealthassistants.com>; Max Day <maxday@wealthassistants.com>
Subject: Re: Your Amazon seller account has been deactivated

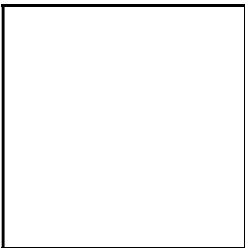
Hi Ben,

I apologize for my delay.

Regarding our conversations over the past week, if your store is not producing sales and making you income by 12/31/22, we will refund your investment to wealth assistants.

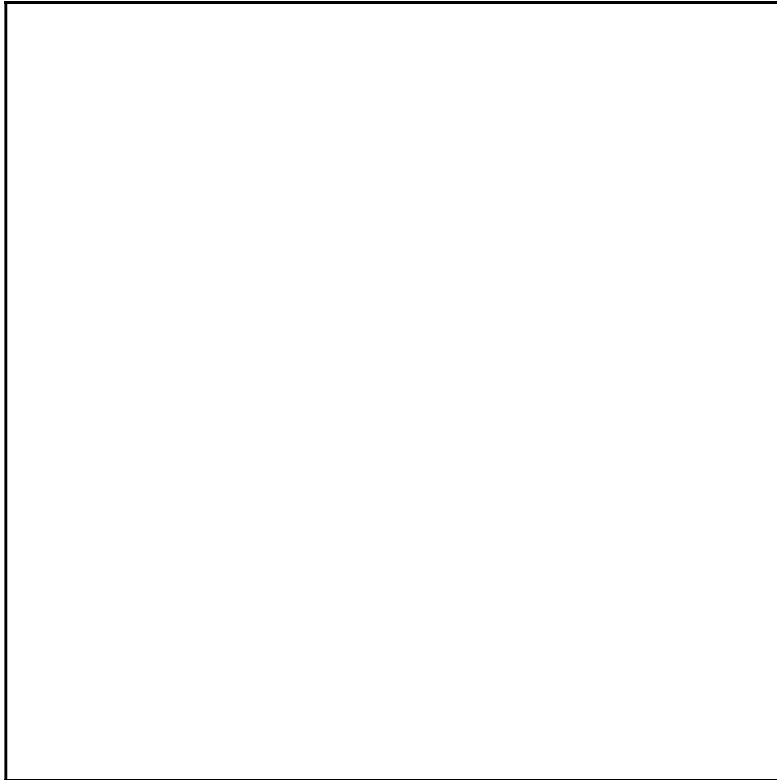
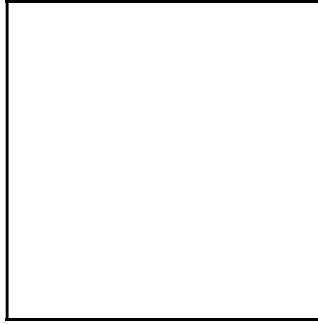
Please keep me posted on the progression of your store! Text or call if need.

Thanks Ben,



Matt Crouch
Chief of Staff
Assisting People Build Modern Day Wealth

☐ [716-864-0136](tel:716-864-0136)
☐ Matt@wealthassistants.com
☐ www.wealthassistants.com



On Mon, Oct 17, 2022 at 10:37 AM <benlajefa@gmail.com> wrote:

Good morning,

Please reply to my email below. Thank you

Ben

From: benlajefa@gmail.com <benlajefa@gmail.com>

Sent: Thursday, October 13, 2022 8:41 AM

To: 'Matt Crouch' <matt@wealthassistants.com>; noah@wealthassistants.com

Cc: carlos@wealthassistants.com; nate@wealthassistants.com; 'Brandon Andrews' <brandon@wealthassistants.com>;

'Max Day' <maxday@wealthassistants.com>

Subject: RE: Your Amazon seller account has been deactivated

Matt,

Thank you for the call. I need some time specific guarantees from WA to make this work. My wife want's our \$35,000 back immediately. As we discussed on the phone, I'm willing to give you all the opportunity to make this investment work and flourish with WA. You sold me on your plan and vision but now please show me you have the operations and back end in place to make my store happen and generate profits.

I need results by 12/31/22, or I need my money back and WA to buy back any existing inventory on hand at that point in time. The new store needs to generate my share of profits at a rate to return a minimum of \$35,000 by my 1-year anniversary (5/28/22) and I need to see these profits prior to the end of 2022.

Please write up this guarantee and include some time specific milestones:

--how long to get my new entity up and running (no one has reached out to me yet...If I did this myself, I know that within a week I could have a new LLC created, EIN, and bank account).

--how long before you have acquired an existing and reputable Amazon store for me

--how long before you can get products sourced and into the Amazon warehouses

I appreciate your time and efforts and look forward to many successes with WA.

Best regards,

Ben David

From: Matt Crouch <matt@wealthassistants.com>

Sent: Wednesday, October 12, 2022 9:58 AM

To: Ben David <benlajefa@gmail.com>; noah@wealthassistants.com

Cc: carlos@wealthassistants.com; nate@wealthassistants.com; Brandon Andrews <brandon@wealthassistants.com>;

Max Day <maxday@wealthassistants.com>

Subject: Re: Your Amazon seller account has been deactivated

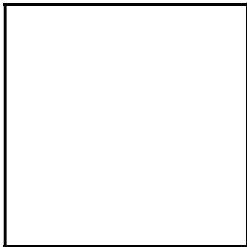
Hey Ben,

Thanks for hoping on the call yesterday. I just wanted to thank you again for giving us another shot at this partnership with you. I promise that WA is motivated more now than ever to make sure the David family is excited about their investment with us!

Going forward, we'll be reaching out to you shortly to re-onboard you with your new store.

Let us know if you need anything else.

Thanks again,

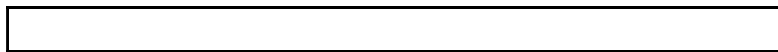


Matt Crouch

Chief of Staff

Assisting People Build Modern Day Wealth

☐ 716-864-0136
☐ Matt@wealthassistants.com
☐ www.wealthassistants.com



From: Ben David <benlajefa@gmail.com>
Sent: Tuesday, October 11, 2022 11:41 AM
To: noah@wealthassistants.com <noah@wealthassistants.com>
Cc: Matt Crouch <matt@wealthassistants.com>; carlos@wealthassistants.com <carlos@wealthassistants.com>;
nate@wealthassistants.com <nate@wealthassistants.com>
Subject: Re: Your Amazon seller account has been deactivated

Yes.

On Tue, Oct 11, 2022 at 9:09 AM <noah@wealthassistants.com> wrote:

Hi Ben,

I understand your concern. Would you be willing to hop on a zoom call this afternoon with myself and our Chief of Staff Matt? If so, please let me know some times that you are available.

Thank you in advance.

Best Regards,



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Noah@wealthassistants.com



www.wealthassistants.com



WEALTH A



Forbes

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Assisting People Build Modern Day Wealth

From: benlajefa@gmail.com <benlajefa@gmail.com>
Sent: Tuesday, October 11, 2022 7:39 AM
To: 'Noah Wickham' <noah@wealthassistants.com>; nate@wealthassistants.com; carlos@wealthassistants.com
Subject: FW: Your Amazon seller account has been deactivated

Good morning,

What is going on? Things are only getting worse with WA. I need an immediate refund of my 35,000. Please confirm today you will be sending me my refund.

Ben David

La Jefa & Co.

575-496-1878

From: Amazon <no-replies-appeals@amazon.com>
Sent: Monday, October 10, 2022 7:12 PM
To: benlajefa@gmail.com
Subject: Your Amazon seller account has been deactivated



Hello,

Your Amazon seller account has been deactivated in accordance with section 3 of Amazon's Business Solutions Agreement. Your listings have been removed.

Why did this happen?

We took this measure due to your violation of Amazon's Seller Policies and Seller Code of Conduct <https://sellercentral.amazon.com/gp/help/G1801>, and your violation of the Amazon Drop Shipping policy <https://sellercentral.amazon.com/gp/help/G201808410>.

After 90 days following this notification, you may separately request a funds disbursement by contacting disbursement-appeals@amazon.com. We will conduct a separate investigation to evaluate your account. If we find that you have engaged in deceptive, fraudulent, or illegal activity; or have abused our systems or repeatedly violated our policies that protect our customers and selling partners, we may withhold some or all funds in your account.

You can view your account performance at https://sellercentral.amazon.com/performance/dashboard?reftag=email_suspend or select Account Health on the home screen of the Amazon Seller app on your iOS or Android device. The Account Health page shows how well your account is performing against the performance metrics and policies required to sell on Amazon.

We will not consider your submission if your request does not provide evidence that you will no longer pose a risk.

Sincerely, Amazon.com

Thank you,
Amazon








David declaration + exhibits

Final Audit Report

2024-03-04

Created:	2024-03-04
By:	Nico Banks (nico@bankslawoffice.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAxAxsBoxOMKjZFjZJu8h5vg1GQic0aYBIHR

"David declaration + exhibits" History

-  Document created by Nico Banks (nico@bankslawoffice.com)
2024-03-04 - 4:05:24 PM GMT
-  Document emailed to Benjamin David (totalhealthnm@gmail.com) for signature
2024-03-04 - 4:05:30 PM GMT
-  Email viewed by Benjamin David (totalhealthnm@gmail.com)
2024-03-04 - 4:46:32 PM GMT
-  Document e-signed by Benjamin David (totalhealthnm@gmail.com)
Signature Date: 2024-03-04 - 4:57:55 PM GMT - Time Source: server
-  Agreement completed.
2024-03-04 - 4:57:55 PM GMT